

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

GWANJUN KIM,

Plaintiff,

Case No. 1:11-cv-00233-RJJ-HWB

v.

GRAND VALLEY STATE UNIVERSITY,
GRAND VALLEY STATE UNIVERSITY –
COLLEGE OF EDUCATION, GRAND
VALLEY STATE UNIVERSITY –
COLLEGE OF COMMUNITY AND PUBLIC
SERVICE, THOMAS J. HAAS, ELAINE C.
COLLINS, PAULA LANCASTER, OLIVIA
A. WILLIAMS, GEORGE GRANT, and LOIS
SMITH OWENS,

Honorable Robert J. Jonker

Magistrate Judge Hugh W. Brenneman, Jr.

Defendants.

GwanJun Kim
360 East Tuttle Road
Lot 54
Ionia, MI 48846
616.902.4344
gwanjun@hotmail.com
PRO SE

Edward J. Bardelli (P53849)
Gregory M. Kilby (P68266)
WARNER NORCROSS & JUDD LLP
900 Fifth Third Center
111 Lyon Street, N.W.
Grand Rapids, MI 49503
616.752.2000
ebardelli@wnj.com
gkilby@wnj.com
Attorneys for Defendants

MOTION FOR SANCTIONS

Defendants respectfully move this Court under FED. R. CIV. P. 11 and the Court's inherent authority for an Order sanctioning Plaintiff GwanJun Kim because Mr. Kim continues to litigate in bad faith and has unreasonably and vexatiously multiplied the proceedings in this case by filing meritless pleadings with this Court resulting in Defendants' expenditure of

significant time and resources. Mr. Kim also obtained the issuance of irrelevant subpoenas to harass current and former Grand Valley State University employees as well as other prominent individuals in the education field. Accordingly, this Court should sanction Mr. Kim by awarding Defendants their costs and fees incurred in responding to each of Mr. Kim's improper pleadings and enter an Order requiring Mr. Kim to seek leave of Court prior to filing any further motions in this matter.

Pursuant to the requirements of Local Rule 7.1(d) and Rule 11(c)(2), Defendants' counsel contacted Plaintiff by U.S. mail to seek concurrence in the relief requested, namely withdrawal of the offending pleadings within twenty-one (21) days of the date of the letter, or November 1, 2011. (*See Exhibit 1.*) Plaintiff did not respond.

This Motion is supported by the accompanying brief.

Dated: November 23, 2011

/s/ Gregory M. Kilby

Edward J. Bardelli (P53849)

Gregory M. Kilby (P68266)

WARNER NORCROSS & JUDD LLP

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ebardelli@wnj.com

gkilby@wnj.com

Attorneys for Defendants

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